

1 Teresa H. Michaud (State Bar No. 296329)
2 teresa.michaud@bakermckenzie.com
3 James Joseph Ward (State Bar No. 263052)
4 joe.ward@bakermckenzie.com
5 Thomas A. D. Tysowsky (State Bar No. 330022)
6 thomas.tysowsky@bakermckenzie.com
7 **BAKER & McKENZIE LLP**
8 1901 Avenue of the Stars, Suite 950
9 Los Angeles, CA 90067
10 Telephone: 310.201.4728
11 Facsimile: 310.201.4721

12 Alexander G. Davis (State Bar No. 287840)
13 alexander.davis@bakermckenzie.com
14 **BAKER & McKENZIE LLP**
15 600 Hansen Way
16 Palo Alto, CA 94304
17 Telephone: 650.856.2400
18 Facsimile: 650 856 9299

19 Attorneys for Defendant
20 MATILOCK, INC.

21 UNITED STATES DISTRICT COURT
22
23 NORTHERN DISTRICT OF CALIFORNIA

24 PAYMAN POULADDEJ,
25
26 Plaintiff,
27
28 v.
29
30 MATILOCK, INC.,
31
32 Defendant.

Case No. 4:20-cv-04273-HSG

**JOINT STIPULATED REQUEST FOR
AN ORDER TO MODIFY BRIEFING
SCHEDULE PURSUANT TO LR 6-
1(b), 6-2(a), 7-12; [PROPOSED]
ORDER**

Judge: The Hon. Haywood S. Gilliam, Jr.

STIPULATION

Pursuant to LR 6-1(b), 6-2(a), and 7-12, this Stipulation is entered into by Plaintiff Payman Pouladdej (“Pouladdej”) and Defendant Matilock, Inc. (“Matilock”) (collectively the “Parties”) seeking an order of the Court to extend briefly the deadline for Pouladdej’s Second Amended Complaint, and for Matilock to file a responsive pleading, in light of the parties’ agreement to settle this dispute. The Parties, through their respective counsel of record, stipulate as follows:

WHEREAS, Pouladdej initiated this action against Matilock on February 17, 2020 in the Northern District of Georgia, styled *Pouladdej v. Matilock, Inc.*, Civil Action File No. 1:20-cv-977-LMM, which action has subsequently been transferred to this Court;

WHEREAS, the Parties have notified the Court (ECF No. 35) that this action is related to the action styled *Matilock, Inc. v. Pouladdej*, Case No. 4:20-cv-01186-HSG, which is currently pending in this Court (collectively, the “Related Actions”);

WHEREAS, the Parties previously stipulated on July 1, 2020 that Pouladdej’s deadline to file a Second Amended Complaint in this action would be July 10, 2020, and Matilock, Inc.’s deadline to file a responsive pleading would be July 31, 2020 (ECF No. 36);

WHEREAS, the Parties are simultaneously filing a Joint Stipulated Request to Extend time in Case No. 4:20-cv-01186-HSG as well as this action for the same reasons set forth herein;

WHEREAS, the Parties in this case have reached a binding agreement on all essential terms to fully resolve the Related Actions;

WHEREAS, the Parties are in the process of memorializing a formal settlement agreement for signature during the week of July 13, 2020;

WHEREAS, the Parties’ settlement agreement calls for the voluntary dismissal, with prejudice, of all claims in the Related Actions;

WHEREAS, the Parties respectfully request the Court enter an order extending the time for Pouladdej to file his Second Amended Complaint (if necessary), and Matilock’s deadline to file a responsive pleading (if necessary), by 7 days in order to give the Parties time to memorialize the settlement agreement.

WHEREAS, the Parties have agreed to the revised briefing schedule:

- Pouladdej to file its Second Amended Complaint (if necessary) on or before **July 20, 2020**
- Matilock to file a responsive pleading (if necessary) on or before **August 7, 2020**.

NOW THEREFORE, in consideration of the foregoing, the Parties, by and through their respective counsel, hereby **STIPULATE** and **AGREE** as follows:

1. On or before **July 20, 2020**, Pouladdej will file his Second Amended Complaint;
2. On or before **August 7, 2020**, Matilock will file a responsive pleading to the Second Amended Complaint;
3. By entering into this Stipulation, the Parties do not waive and expressly preserve any and all rights and defenses.

IT IS SO AGREED AND STIPULATED.

Dated: July 10, 2020

Respectfully submitted,

BAKER & MCKENZIE LLP
TERESA H. MICHAUD
JAMES JOSEPH WARD
ALEXANDER G. DAVIS
THOMAS A. D. TYSOWSKY

By: /s/ Teresa H. Michaud
Teresa H. Michaud
Attorneys for Defendant
Matilock, Inc.

GREENBERG TRAURIG, LLP
HOWARD HOLDERNESS
STEVEN ROSENWASSER
ANDREW Z. SMITH

Dated: July 10, 2020

By: /s/ Howard Holderness
Howard Holderness
Attorneys for Plaintiff
Payman Pouladdej

Howard Holderness (State Bar No. 169814)
holdernessh@gtlaw.com
GREENBERG TRAURIG, LLP
4 Embarcadero Center, Suite 3000
San Francisco, California 94111
Tel: 415-655-1300

Steven Rosenwasser
Andrew Smith
GREENBERG TRAURIG, LLP
3333 Piedmont Road, N.E.
Terminus 200
Suite 2500
Atlanta, Georgia 30305
rosenwassers@gtlaw.com
Tel: 678-553-7288
(*pro hac* forthcoming)

FILER'S ATTESTATION OF CONCURRENCE

I, Teresa H. Michaud, attest that I am the lead counsel for Defendant Matilock, Inc. As the ECF user and filer of this document, I attest that concurrence in the filing of this document has been obtained from its signatories.


Dated: July 10, 2020

/s/ Teresa H. Michaud
Teresa H. Michaud

PURSUANT TO STIPULATION, IT IS SO ORDERED

7/14/2020

Dated:


The Hon. Haywood S. Gilliam, Jr.
United States District Court Judge